

FRANKLYN RAMLOCHAN

February 27, 2018

Page 1

1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA
3 - - -

4 FRANKLYN RAMLOCHAN, : CIVIL ACTION NO.
5 : 17-cv-3854
6 Plaintiff, :
7 :
8 vs. :
9 :
10 RAILSERVE, INC., :
11 :
12 Defendant. :
13 :
14 - - -

15 Philadelphia, Pennsylvania

16 February 27, 2018
17 - - -

18 ORAL DEPOSITION of FRANKLYN

19 RAMLOCHAN, taken pursuant to notice, held at
20 Reilly, Janiczek & McDevitt, Henrich & Cholden,
21 P.C., One South Penn Square, 1339 Chestnut
22 Street, Suite 410, commencing at 9:01 a.m.,
23 before Stephanie Weldon, Court Reporter -
24 Notary Public there being present:
25

26 - - -
27 U.S. LEGAL SUPPORT
28 REGISTERED PROFESSIONAL REPORTERS
29 1818 MARKET STREET, SUITE 240
30 PHILADELPHIA, PA 19103
31 (877) 479-2484

U.S. Legal Support, Inc.
(312) 236-8352

EXHIBIT

A

FRANKLYN RAMLOCHAN

February 27, 2018

Page 52

1 on there, other, I don't know. I don't
2 consider myself, you know, a Caucasian. Some
3 people may consider me Black. I really don't
4 know. So, if I were to fill out an
5 application, I would put either other or Asian.

6 Q. Okay. And I apologize in advance, but
7 you said your parents were east Indian. So,
8 did they come from someplace else to Trinidad?

9 A. Yes. From parents or grand parents, I
10 would go with grandparents, came from east
11 India to Trinidad.

12 Q. Okay. So, they originally came from
13 India to Trinidad?

14 A. Yes. I'm not sure which one, but
15 somebody.

16 Q. Somebody, okay. All right. Let's talk
17 about Larry Williams for a minute. Did he make
18 any derogatory comments about Mr. Santiful?

19 A. I can't remember.

20 Q. And did Larry Williams ever say
21 anything derogatory to you about you?

22 A. No, not that I can remember.

23 Q. All right. You mentioned that there
24 was some sort of interaction with Mr. Palmer
25 where he said something about closing the door.

FRANKLYN RAMLOCHAN

February 27, 2018

Page 55

1 A. Not sure. I worked on two crews. It
2 could either have been Ben MacCumbee or Allen
3 Reeves. I think it was Ben, but I'm not sure.

4 Q. And I take it that you thought that
5 Matt Palmer was talking about your immigration
6 status with this comment?

7 A. Well, yes. It's hard to imagine
8 otherwise.

9 Q. To your knowledge, is either Ben
10 MacCumbee or Allen Reeves an immigrant?

11 A. No, they're both American-born
12 Caucasian.

13 Q. When Matt Palmer made that comment,
14 what, if anything, did you say in response?

15 A. They can close the door, I'm already
16 here.

17 Q. And what, if anything, did Matt Palmer
18 say in response to that?

19 A. He just turned and walked away.

20 Q. Did you complain about that statement
21 to anyone?

22 A. No.

23 Q. Was that the first time that Matt
24 Palmer had made a statement concerning your
25 immigration status?